

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

EXHIBIT 5

30(b)(6) President Brenda C. Murphy
The South Carolina State Confvs.McMaster/Alexander

August 8, 2022

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and

6 TAIWAN SCOTT, ON BEHALF OF HIMSELF
AND ALL OTHER SIMILARLY SITUATED
PERSONS.

Plaintiffs,

vs. Case No. 3:21-CV-03302-MGL-TJH-RMG

10 THOMAS C. ALEXANDER, IN HIS OFFICIAL
11 CAPACITY AS PRESIDENT OF THE SENATE;
12 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY
13 AS CHAIRMAN OF THE SENATE JUDICIARY
14 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL
15 CAPACITY AS SPEAKER OF THE HOUSE OF
16 REPRESENTATIVES; CHRIS MURPHY, IN HIS
17 OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE
18 OF REPRESENTATIVES JUDICIARY COMMITTEE;
WALLACE H. JORDAN, IN HIS OFFICIAL CAPACITY
AS CHAIRMAN OF THE HOUSE OF REPRESENTATIVES
ELECTIONS LAW SUBCOMMITTEE; HOWARD KNAPP,
IN HIS OFFICIAL CAPACITY AS INTERIM
EXECUTIVE DIRECTOR OF THE SOUTH CAROLINA
STATE ELECTION COMMISSION; JOHN WELLS,
JOANNE DAY, CLIFFORD J. EDLER, LINDA MCCALL,
AND SCOTT MOSELEY, IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE SOUTH CAROLINA
STATE ELECTION COMMISSION.

Defendants.

21 DEPOSITION OF: THE SOUTH CAROLINA STATE CONFERENCE
22 OF THE NAACP
23 BY: PRESIDENT BRENDA C. MURPHY
24 (Via Videoconference)

DATE: Monday, August 8, 2022

TIME: 1:22 p.m.

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1 MR. TYSON: Sure. We will be back in
2 five minutes.

3 THE WITNESS: Okay.

4 (Break In Proceedings)

5 MR. INGRAM: Rob, I just want to state
6 for the record that we preserve any objections for
7 topics that are outside of the scope of the noticed
8 30(b)(6) subjects.

9 MR. TYSON: Thank you.

10 BY MR. TYSON:

11 Q. All right. Ms. Murphy, I think when we
12 left off we were going through a bunch of emails
13 talking about how the State Conference was getting
14 prepared and training and participating in the
15 process. One of the questions that I had was -- and
16 I think you answered it earlier, but the State
17 Conference -- or the NAACP did provide a draft map
18 to the Legislature for a Congressional plan.

19 Correct?

20 A. Yes.

21 Q. And do you recall getting any feedback
22 about that proposed plan?

23 A. No.

24 Q. How was the map drawn? Or let me step
25 back. That was a poor question. Excuse me. What

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1 were the criteria -- how did you come up with a
2 certain plan on how to draw the seven Congressional
3 districts?

4 A. As I mentioned, you know, we worked with
5 other resources. ACLU had demographers. You know,
6 we looked at what we thought might be good. And,
7 you know, the demographer and the statisticians
8 looked at the data to help us, you know, make
9 decisions that were based on the criteria and if
10 there were maybe -- you know, it was a joint effort,
11 I guess that's what I should say, in terms of us
12 working together, of sharing our ideas, our
13 thoughts, looking at what we thought were
14 challenges, and they came up -- the demographers
15 came up with a map which we reviewed and we agreed
16 upon.

17 Q. You said you looked at the criteria. It
18 was based on criteria?

19 A. I said the demographers, the
20 statisticians, they all helped us to make sure that
21 when the map drawing was being done that we were
22 looking at it in an objective way that we were
23 meeting criteria that needed to be met.

24 So bottom line is, rephrasing it, they
25 kept us focused, in order for us not to be maybe

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1 South Carolina State Conference Of The NAACP And Scott, Taiwan
v. McMaster, Henry, Et Al.

2 30(b)(6) President Brenda C. Murphy (#5340046)

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23 30(b)(6) President Brenda C. Murphy

Date

24

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3 ACKNOWLEDGEMENT OF DEPONENT

4 I, 30(b)(6) President Brenda C. Murphy, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10

11

12 30(b)(6) President Brenda C. Murphy

Date

13

*If notary is required

14

SUBSCRIBED AND SWORN TO BEFORE ME THIS

15

_____ DAY OF _____, 20____.

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NOTARY PUBLIC

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